

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

G.T., by and through next friend,)	
LILIANA T. HANLON, SHIMERA)	
JONES, LEROY JACOBS, BALARIE)	
COSBY-STEELE, JOHN DEMATTEO,)	Case No. 1:21-cv-04976
RICHARD MADAY, MARK HEIL,)	
ALLISON THURMAN, and SHERIE)	
HARRIS, individually and on behalf of all)	Hon. Nancy L. Maldonado
others similarly situated,)	Presiding Judge
)	
Plaintiffs,)	
)	
v.)	
)	
SAMSUNG ELECTRONICS AMERICA,)	
INC., and SAMSUNG ELECTRONICS)	
CO., LTD.)	
)	
Defendants.)	

**PLAINTIFFS' SECOND UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE RESPONSE TO DEFENDANTS' MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Plaintiffs, G.T., a minor by and through next friend Liliana T. Hanlon, Shimera Jones, Leroy Jacobs, Balarie Cosby-Steele, John DeMatteo, Richard Maday, Mark Heil, Allison Thurman, and Sherie Harris (collectively, "Plaintiffs") request that the Court extend the time for Plaintiffs to file their response ("Response") to Defendants Samsung Electronics America, Inc. and Samsung Electronics Co., Ltd.'s (collectively, "Samsung") motion to dismiss by one week, up to and including March 15, 2023, and extend the time for Samsung to file its reply ("Reply") to April 17, 2023.

In support of this Motion, Plaintiffs state as follows:

1. On March 2, 2023, this Court entered an Order extending Plaintiffs' deadline to respond to Samsung's motion to dismiss to March 8, 2023. ECF No. 57. This deadline has not

passed.

2. Although Plaintiffs' counsel has worked diligently since that time, he requires a final one-week extension of time to complete the draft Response and circulate it for review, in part, because counsel lost approximately 12-13 hours of work when a system error on their virtual desktop prevented the document from being saved to the system, and the only portion of the document the IT administrators could locate was the initial shell/outline of the Response.

3. Plaintiffs respectfully submit that the foregoing constitutes good cause for the extension sought here.

4. The proposed extension will not unduly delay these proceedings or prejudice the parties.

5. This is the second extension request related to the motion to dismiss.

6. Plaintiffs' counsel contacted Samsung's attorneys prior to filing, who confirmed Samsung does not object to this Motion so long as it receives a corresponding extension of time to file its Reply, up through and including April 17, 2023.

WHEREFORE, Plaintiffs respectfully request that the Court enter an Order:

- A. Granting this Motion;
- B. Extending the deadline for Plaintiffs to file their response to Samsung's motion to dismiss (ECF No. 55) to March 15, 2023;
- C. Extending the time for Samsung to file its reply by to April 17, 2023; and
- D. Awarding any further relief the Court deems necessary and proper.

Dated: March 7, 2023

Respectfully submitted,

G.T., BY AND THROUGH NEXT FRIEND LILIANA T. HANLON, SHIMERA JONES, LEROY JACOBS, BALARIE COSBY-STEELE, JOHN DEMATTEO, RICHARD MADAY, MARK HEIL, AND ALLISON THURMAN, individually and on behalf of all others similarly situated, Plaintiffs

By: /s/ Gregg M. Barbakoff
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CERTIFICATE OF SERVICE

I hereby certify that, on **March 7, 2023**, I caused a copy of the foregoing document, along with any attached exhibits, to be served upon all counsel of record via electronic filing using the CM/ECF system.

/s/ Gregg M. Barbakoff